

# ZMO LAW PLLC

## MEMO ENDORSED.

*Via ECF and email*

Hon. Ona T. Wang  
Southern District of New York  
US Courthouse, SDNY  
40 Foley Square  
New York, NY 10007

March 28, 2025

Plaintiffs are directed to file the referenced subpoena under seal by **April 3, 2025**.

**SO ORDERED.**



Ona T. Wang  
U.S.M.J.

Apr. 1, 2025

RE: *Jane Stone v. Annucci (SDNY)*, 20 Civ. 1326 (RA)(OTW)

Dear Judge Wang:

This office represents the Plaintiffs in the above-captioned matter. We write to request that the Court issue a subpoena for Plaintiff Jane Stone #7's medical records from her period of incarceration. Counsel has endeavored to get these records, but is facing significant difficulties in large part because the entity has not responded to: (i) the specialized authorization release form which the entity required Jane Stone #7 to execute and submit; (ii) a letter submitted on February 26, 2025; and, (iii) numerous attempts to contact the entity by phone.

Further delay in obtaining the records has the potential to delay the deposition of Plaintiff Jane Stone #7.

As such, we are requesting the Court issue the attached subpoena. We are further requesting permission to submit the subpoena under seal, as it contains the Plaintiff Jane Stone #7's name, and the specific location where she received medical care.

Thank you for your attention to this case.

Very truly yours,

*Tess M. Cohen*

Tess M. Cohen  
Partner

Encls. Requested Subpoena

CC: All Counsel (via ECF)